



DISABILITY AND COMMUNICATION ACCESS BOARD

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INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all buildings and facilities constructed by, or on behalf of the State or any county, shall conform to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-217, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

Docket: **DCAB 2008-02:** Do engineered wood fibers meet the minimum requirements specified in section 4.5 of the ADAAG?

Summary: This question was raised because there are projects in which the floor or ground surface specified is an engineered wood fiber (EWF). EWF is commonly specified for play areas and is a material that is dependent on maintenance to maintain its accessibility over time. At the time of installation, the material may meet the ADAAG 4.5 for ground surfaces. However over time the material settles and tends to wear or become loose, if not properly maintained. DCAB does not recommend its use as it relies on continued maintenance to remain accessible and may not be accessible later if not properly maintained.

DCAB contacted both the U.S. Access Board and the U.S. Department of Justice regarding the use of EWF. The U.S. Access Board stated that they also do not recommend the use of EWF if it is not going to be maintained because it does rely on proper and continued maintenance to remain accessible. As the material settles, new material needs to be added, enough so that there is not a change in level and to ensure the material does not shift and move. The U.S. Access Board recognized that Hawaii has a problem with insects and noted that EWF can promote termites, as it is a natural material.

The U.S. Department of Justice stated that ground and floor surfaces shall be firm, stable and slip resistant. Whether a material such as EWF meets that description can depend on whether the material is compacted. The U.S. Department of Justice also noted that there is an obligation under the ADA to maintain accessible surfaces.

Ruling: For buildings or facilities subject to HRS §103-50,

ADAAG Section 4.5.1 Ground and Floor Surface.

Engineered Wood Fibers (EWF) may provide accessible surfaces in compliance with the criteria for firmness, stability, slip resistance, and changes in level when the product is properly installed and maintained. DCAB warns that the use of EWF if not properly maintained, may become a non-accessible surface that does not comply with ADAAG Section 4.5.

Where EWF is used in areas required to be accessible, it shall be firm, stable and slip-resistant and the EWF shall be maintained to remain compliant with the ADAAG requirements of section 4.5.

- EWF shall be maintained so as to remain firm, stable and slip resistant.
- Changes in level at the connection of the EWF to other ground or floor materials along the accessible route and within the area covered by the EWF, shall not exceed ½ inch. Between ¼ inch and ½ inch the change in level shall be beveled with a slope no greater than 1:2

Where EWF is used for buildings or facilities subject to HRS §103-50, a signed ‘EWF Maintenance Statement’ form shall be submitted to DCAB as part of the document review process. (See attached)

Advisory:

A firm surface resists deformation by either indentations or particles moving on its surface.

A stable surface is one that remains unchanged by contaminants or applied force, so that when the contaminant or force is removed, the surface returns to its original condition.

A slip-resistant surface provides sufficient frictional counterforce to the forces exerted in walking to permit safe ambulation.

Advisory: *The U.S. Access Board’s Final Accessibility Guidelines for Play Areas Economic Assessment dated October 2000 concluded: “The expense of installing a higher priced surfacing that needs less maintenance could be less than the expense of installing a lower priced surface that needs more maintenance. This situation is most likely to occur in regions with relatively high labor rates.”*

[Rul: 03/19/2008] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call us at 586-8121.

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